

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

UNITED STATES OF AMERICA,

*Plaintiff,*

V.

ALI AL-TIMIMI,

*Defendant.*

Case No. 1:04-cr-385 (LMB)

## MOTION TO APPOINT CJA CO-COUNSEL

Defendant Dr. Ali Al-Timimi respectfully moves this Court to appoint attorney Thomas M. Huff as CJA co-counsel in the Appeal that the government noticed yesterday. Dkt. No. 521.

In further support, the defense states as follows:

1. Attorney Huff has been counsel of record in both this Court and the U.S. Court of Appeals for the Fourth Circuit since November of 2014.
2. Attorney Huff argued before this Court the defendant's Emergency Motion for Release Pending Appeal [Dkt. No. 465] that is the subject of the instant Appeal, and was also the primary drafter of the motion's supporting briefs and notices.
3. Attorney Huff was also the principal drafter of several other pending motions referenced in this Court's Memorandum Opinion, including the defendant's Renewed Motion for Acquittal on Counts 7 and 8 [Dkt. No. 432], his Renewed Motion for Acquittal on Count 1 [Dkt. No. 445], and his Motion for Leave to Seek a New Trial on Counts 9-10 [Dkt. No. 460].
4. Attorney Huff intends to remain actively involved in the appeal, and respectfully submits that he is ideally situated to do so given his previous work outlined above. Mr. Huff has

thus far performed all legal work in this case on a pro bono basis without the resources of a large law firm.

5. Attorney Jonathan Turley will remain CJA counsel per the Court's order today at Dkt. No. 524, but Mr. Huff respectfully seeks to be appointed as CJA co-counsel.

Dated: August 26, 2020

Respectfully submitted,

/s/

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Attorneys for Defendant Dr. Ali Al-Timimi

### **CERTIFICATE OF SERVICE**

I certify that on August 26, 2020, I will file the foregoing document on the CM/ECF system, which will then serve it by sending an electronic notification on all counsel of record.

/s/

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